

## REQUEST FOR CLARIFICATION/INTERPRETATION

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| <b>TO:</b> | Name and Title:<br><b>Jeff Sturm</b>                | <b>FROM:</b> | Name and Title:<br><b>Tara Williamson</b>       |
|            | Organizational Unit:<br><b>DDP Program Director</b> |              | Organizational Unit:<br><b>STEP, Inc.</b>       |
|            | Address:  |              | Address:<br><b>644 Grand Ave., Billings, MT</b> |

1. TYPE OF REQUEST: ☐ Follow-up to Verbal Request - Date of Verbal Request: ☒ Written Request

2. STATEMENT OF QUESTION OR ISSUE: STEP Inc. is requesting clarification about the number and frequency of GERs that should be generated per the Incident Management Procedure to assure that we are in compliance with the expectations of DDP. Please clarify the following-

1. What services fall within the scope of the Incident Management Procedure?  
Part C  
Limited Family Education and Support  
Full Family Education and Support  
Children's Autism Waiver
2. Respite staff who provide services in isolated areas often do not have access to a computer. What process should they follow to complete a GER?
3. Some people we serve have skin sensitivities or other types of known conditions that are being treated by a physician. If the diagnosed condition involves one of the examples of "injury" (such as "redness"), is it necessary to write a GER when the symptom is discovered or observed?
4. Some people receiving services engage in frequent and very mild aggressive behaviors that fit the definition of "altercation" per the Incident Management Procedure. Trained staff are implementing appropriate programming and the "injury" to staff is momentary or superficial. Is a GER required every time that this is observed or discovered?

3. ANSWER:

- 1) All DDP services fall under the Incident Management Policy. However, neither Part C Family Education and Support and Title XX Family Education and Support services are intended to meet all of an individual's needs. They are designed to address the child's development as identified through assessments. Waiver services are intended to address a person's assessed needs either by the provision of waiver services or through other identified supports as described in the plan of care. When a child is receiving Part C or Title XX Family Education and Support Services, the incidents that fall within the scope of the Incident Reporting Rule are those incidents that occur when the provider agency is delivering a service funded by Part C or Title XX Family Education and Support. For children receiving waiver services, those incidents that meet the incident reporting definitions are to be reported as required by the rule and manual.
- 2) Isolated staff may fill out a hardcopy and submit it to STEP for entry into the Incident Management Data System.
- 3) This example is not an injury but rather a medical condition. The team should seek input from the physician as to the necessity of tracking/recording the skin condition. This may provide some valuable information to the physician in the treatment of the individual.
- 4) If the incident meets the alternation definition listed in the manual, regardless if it is momentary or superficial, the incident must be entered into the data system.

References

*Aprelene M. [Signature]* Approved and Issued by:  
Date: *reissued 5/22/15*

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| <b>STATE USE ONLY</b> | 4: DISTRIBUTION:<br><br>One Copy:<br>One Copy:<br>One Copy:<br>Additional Copies:<br><input type="checkbox"/> _____ | 5: FOLLOW-UP:<br><input type="checkbox"/> To be issued as Bulletin to: _____ (Division Administrator)<br><b>Manual. Expected Date of Issuance:</b> _____<br><input type="checkbox"/> A.R.M. Change<br><input type="checkbox"/> State Plan Change |
|                       | Requestor<br>Manual Coordinator<br>Division Files   |  |